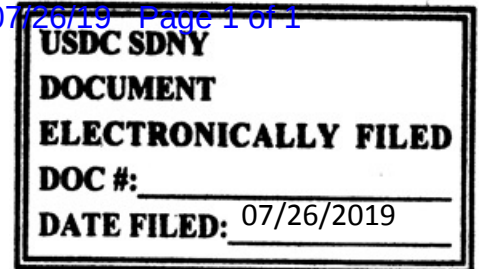


BLANKROME

1271 Avenue of the Americas | New York, NY 10020
blankrome.com

Phone: (212) 885-5148
Fax: (917) 591-7897
Email: dskakel@blankrome.com



July 25, 2019

VIA EMAIL & ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court – S.D.N.Y.
500 Pearl Street, Room 750
New York, New York 10007

Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,
No. 1:15-cv-05345 (AJN) (KHP)

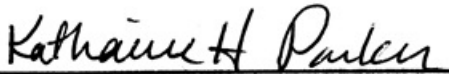
Dear Judge Parker:

We represent Triadou SPV S.A. (“Triadou”) and write to respectfully request that the Court accept for filing under seal the enclosed reply memorandum of law in further support of Triadou’s motion to preclude the SMP Documents, as well as certain exhibits to the Reply Declaration of Deborah A. Skakel. As required by Rule III(d) of the Court’s Individual Practices, Triadou is submitting a version of its reply with highlights reflecting proposed redactions and will electronically file the proposed redacted version of its reply and exhibits. Triadou is also submitting to this Court a sealed copy of the same.

Triadou respectfully requests that its reply and certain exhibits to the Reply Declaration of Deborah A. Skakel be filed under seal because they reference documents that were previously sealed in connection with Triadou’s opening memorandum, as well as the opposition thereto submitted by the City of Almaty, Kazakhstan and BTA Bank JSC (together, “Almaty/BTA”), including documents designated as “Confidential” under the Stipulated Protective Order. To the extent it includes documents not previously sealed in connection with those briefs, Triadou has contacted Almaty/BTA to confirm that they would like the additional documents Triadou has cited to be filed under seal as well, for the same reasons set forth in Almaty/BTA’s letter request to seal on this issue. (*See* ECF 1119 (citing ECF 1081)).

In accordance with the Stipulated Protective Order in this case, as well as this Court’s prior orders granting the sealing of information in connection with discovery motions and pre-motion letters, (*see* ECF 1082), Triadou respectfully requests that its reply memorandum of law and certain exhibits accompanying the Reply Declaration of Deborah A. Skakel be filed under seal.

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

07/26/2019

Respectfully submitted,

s/ Deborah A. Skakel
Deborah A. Skakel